

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA

V.

NO. 4:10CR169

Judge Folsom

ALEJANDRO CASILLAS PRIETO (1)

a.k.a. "Alex"

SERGIO ORTEGA (2)

a.k.a. "Chino"

JESUS OSVALDO VALADEZ (3)

CAMILO BANALES (4)

a.k.a. "Camilo Jimenez Banales"

JOEL B. MORENO (5)

a.k.a. "Joel Moreno"

a.k.a. "Joel Moreno Brito"

a.k.a. "Joel Brito Moreno"

a.k.a. "Carlos Ramirez-Prada"

ALMA PATRICIA MORENO (6)

a.k.a. "Alma Moreno"

a.k.a. "Alma Garcia"

a.k.a. "Alma Patricia Garcia"

BEATRIZ ANN GUERRA (7)

a.k.a. "Beatriz Anne Guerra"

ANGELA SAUCEDO GUERRA (8)

JESUS ENRIQUEZ SANCHEZ (9)

a.k.a. "Jesse Sanchez"

a.k.a. "Jessie Sanchez"

VICTOR LUNA (11)

RAMIRO MORENO-BRITO (12)

HILDEGARDO RODRIGUEZ

VIRON (13)

a.k.a. "Javier"

a.k.a. "Rufino"

FILED

U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS

FEB 16 2011

DAVID J. MALAND, CLERK

BY

DEPUTY

THIRD SUPERSEDING INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

Count One

Violation: 21 U.S.C. § 846
(Conspiracy to Possess with the Intent to
Manufacture and Distribute
Methamphetamine)

That from sometime in or about January 2008, and continuously thereafter up to
and including December 8, 2010, in the Eastern District of Texas and elsewhere,

Alejandro Casillas Prieto, a.k.a. "Alex"
Sergio Ortega, a.k.a. "Chino"
Jesus Osvaldo Valadez
Camilo Banales, a.k.a. "Camilo Jimenez Banales"
Joel B. Moreno
a.k.a. "Joel Moreno", "Joel Moreno Brito", "Joel Brito Moreno", "Carlos Ramirez-Prada"
Alma Patricia Moreno
a.k.a. "Alma Moreno", "Alma Garcia", "Alma Patricia Garcia"
Beatriz Ann Guerra, a.k.a. "Beatriz Anne Guerra"
Angela Saucedo Guerra
Jesus Enriquez Sanchez, a.k.a. "Jesse Sanchez", "Jessie Sanchez"
Victor Luna
Ramiro Moreno-Brito
Hildegardo Rodriguez Virgon, a.k.a. "Javier", "Rufino"

defendants, did knowingly and intentionally combine, conspire, and agree with each other
and other persons known and unknown to the United States Grand Jury, to knowingly and
intentionally possess with the intent to manufacture and distribute 500 grams or more of a
mixture or substance containing a detectable amount of methamphetamine and/or 50
grams or more of methamphetamine (actual) , a violation of 21 U.S.C. § 841(a)(1).

In violation of 21 U.S.C. § 846.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

Criminal Forfeiture Pursuant to 21 U.S.C. § 853

As a result of committing the offenses charged in this Second Superseding Indictment, these defendants herein may have used or intended to use, property to commit or facilitate the offenses and/or property derived from proceeds obtained directly or indirectly as a result of the commission of the violation of 21 U.S.C. § 846 , including but not limited to the following:

\$3,760.00 in U.S. currency seized from **Alejandro Casillas Prieto**;

\$1,300.00 in U.S. currency seized from **Alejandro Casillas Prieto**;

\$24,459.53 in U.S. currency seized from **Sergio Ortega**;

\$3,475.00 in U.S. currency seized from **Jesus Osvaldo Valadez**;

CASH PROCEEDS -

Approximately \$2,000,000.00 in United States currency and all interest and proceeds traceable thereto, in that such sum in aggregate is proceeds obtained directly or indirectly as a result of the commission of the aforesaid violations.

SUBSTITUTE ASSETS -

If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without

difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described above.

By virtue of the commission of the offenses charged in this Second Superseding Indictment, any and all interest the defendants have in the above-described property is vested in the United States and hereby to the United States pursuant to 21 U.S.C. § 853.

A TRUE BILL

Dm C
GRAND JURY FOREPERSON

JOHN M. BALES
UNITED STATES ATTORNEY


ERNEST GONZALEZ
Assistant United States Attorney

2/16/2011
Date

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EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
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SERGIO ORTEGA (2)	§	
a.k.a. "Chino"	§	
JESUS OSVALDO VALADEZ (3)	§	
CAMILO BANALES (4)	§	
a.k.a. "Camilo Jimenez Banales"	§	
JOEL B. MORENO (5)	§	
a.k.a. "Joel Moreno"	§	
a.k.a. "Joel Moreno Brito"	§	
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VICTOR LUNA (11)	§	
RAMIRO MORENO-BRITO (12)	§	
HILDEGARDO RODRIGUEZ	§	
VIRON (13)	§	
a.k.a. "Javier"	§	
a.k.a. "Rufino"	§	

NOTICE OF PENALTY

Count One

Violation: 21 U.S.C. § 846

Penalty: If 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine or if 50 grams or more of Methamphetamine (actual) -- not less than 10 years and not more than life imprisonment, a fine not to exceed \$4 million, or both; supervised release of at least five (5) years;

If 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine or if 5 grams or more of Methamphetamine (actual) -- not less than five (5) and not more than 40 years imprisonment, a fine not to exceed \$2 million, or both; supervised release of at least four (4) years;

If less than 50 grams of a mixture or substance containing a detectable amount of methamphetamine or if less than 5 grams of Methamphetamine (actual) -- not more than 20 years imprisonment, a fine not to exceed \$1 million, or both; supervised release of at least three (3) years.

Special Assessment: \$100.00